

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

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BRENDA LEUZZI and GEORGE LEUZZI,	:	
Plaintiffs,	:	6:14-CV-6218 (DGL)(JWF)
-against-	:	
ETHICON INC., ETHICON ENDO SURGERY, INC., ETHICON WOMEN'S HEALTH AND UROLOGY, a division of ETHICON, INC. and ABC CORPORATIONS 1-10 and JOHN DOES 1- 10 and JANE DOES 1-10,	:	[PROPOSED] SCHEDULING ORDER
Defendants.	:	
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STIPULATED ORDER

IT IS HEREBY STIPULATED AND AGREED, by and between counsel for the Plaintiffs Brenda Leuzzi and George Leuzzi ("Plaintiffs") and Defendant Ethicon, Inc. ("Ethicon"), subject to the approval and order of the Court, that discovery and pre-trial proceedings shall be completed according to the following schedule:

Event	Date
Initial Disclosures	October 1, 2014
Amendments to Pleadings/Joinder of Parties	October 22, 2014
Close of Fact Discovery	June 26, 2015
Plaintiffs' Expert Reports/Disclosure	July 31, 2015
Defendant's Expert Reports/Disclosure	August 28, 2015

Expert Depositions Concluded/ Close of Expert Discovery	October 30, 2015
Deadline for Dispositive Motions (and motions to compel discovery)	December 11, 2015
Responses to Dispositive Motions	January 15, 2016
Replies to Dispositive Motions	February 12, 2016
Trial	April 2016

Dated: New York, New York
October 1, 2014

Respectfully Submitted,

/s/ Andres Alonso
Andres Alonso, Esq.
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Attorneys for Defendant Ethicon, Inc.

SO ORDERED, this _____ day of

_____, 2014.
